

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO: 04 11572 JLT

SUSAN COONEY,
Plaintiff,

v.

HUMANISTIC PSYCHOLOGY
INSTITUTE, d/b/a SAYBROOK
INSTITUTE and MAUREEN O'HARA,
Individually,
Defendants.

**MOTION OF THE DEFENDANTS
FOR ADMISSION OF ATTORNEY PRO HAC VICE**

Defendants respectfully move pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, for an order permitting the admission *pro hac vice* of Attorney Michael J. Vartain to practice and appear on behalf of this case. As grounds for this Motion, as set forth in Attorney Michael J. Vartain affidavit, attached hereto as Exhibit A, defendants state as follows:

1. Attorney Michael J. Vartain is a partner with Vartain Law Group, 601 Montgomery Street, San Francisco, California.
2. Michael J. Vartain is a member in good standing in every jurisdiction in which he has been admitted to practice;
3. There are no disciplinary proceedings pending against Attorney Vartain as a member of the bar of any jurisdiction; and
4. Attorney Vartain is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Defendants respectfully ask that its Motion to have Michael J. Vartain, Esquire admitted pro hac vice be granted.

Defendants,

/s/ Grace V. Bacon Garcia

Grace V. Bacon Garcia, BBO #640970
MORRISON MAHONEY LLP
250 Summer Street
Boston, MA 02210
(617) 439-7500

CERTIFICATE OF SERVICE

On this December 12, 2005, I served a copy of the following:

**MOTION OF THE DEFENDANTS FOR ADMISSION OF ATTORNEY PRO
HAC VICE;**

AFFIDAVIT OF MICHAEL J. VARTAIN, ESQUIRE

upon counsel of record via electronic mail to:

E. Steven Coren, Esq.
Paul W. Morenberg, Esq.
Kerstein, Coren, Lichtenstein & Finkel, LLP
60 Walnut Street
Wellesley, MA 02481

/s/ Grace V. Bacon Garcia

Grace V. Bacon Garcia